

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON**

IN RE:

**Donald William Smith
Keira Morgan Smith**

Debtor(s)

**Case No. 3:16-bk-30570
Chapter 7
Judge Lawrence S. Walter**

**RESPONSE TO MOTION TO AVOID LIEN
BY SPRINGLEAF FINANCIAL SERVICES OF OHIO, INC.
(Document No. 16)**

Now comes Springleaf Financial Services Of Ohio, Inc., by and through Counsel, and hereby submits its Response to Motion to Avoid Lien, Document No. 16, filed May 19, 2016 and states as follows:

1. Movant has filed a Motion seeking to avoid the lien of respondent on certain personal property items.
2. Creditor has a security interest in personal property. Creditor states that the 2005 Cadillac CTS VIN: 1G6DP557150126621 lien is not avoidable.

WHEREFORE, creditor respectfully requests that its interest in this proceeding be protected and debtor(s)'s motion be overruled.

Respectfully submitted,

/s/Stephen D. Miles
STEPHEN D. MILES #0003716
Attorney for Creditor
18 West Monument Avenue
Dayton, Ohio 45402
(937) 461-1900/461-0444 fax
sdm@mileslaw.com

CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2016 a true and correct copy of the foregoing Response to Motion to Avoid Lien was served

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

Asst US Trustee (Day) at USTPRegion09.CB.ECF@usdoj.gov
Marianne Graham Dorman at mariannedorman@outlook.com
Paul Spaeth at spaethlaw@phslaw.com, OH45@ecfcbis.com

And by regular U.S. mail, postage prepaid, on:

Donald William Smith and Keira Morgan Smith
428 Little League Drive
Eaton, OH 45320

/s/ Stephen D. Miles
STEPHEN D. MILES
Attorney at Law